

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

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February 3, 2004

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IN RE: *Implementation of the Federal*) *Docket No. 03-00491*
Communications Commission's Triennial)
Review Order - 9 Month Proceeding -)
Switching

AT&T MOTION TO REQUIRE BELL SOUTH TO RESPOND TO DISCOVERY

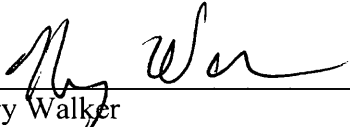
AT&T Communications of the South Central States, LLC ("AT&T") files this motion asking that the Hearing Officer issue an order requiring BellSouth Telecommunications, Inc. ("BellSouth") to respond to AT&T's Second Set of Interrogatories in the above-captioned proceeding.

On January 30, 2004, BellSouth filed objections to AT&T's Second Set of Interrogatories. BellSouth's specific objections are all based on the company's concern that the requested information falls under the category of Customer Proprietary Network Information ("CPNI"), as defined by the Federal Communications Commission ("FCC"). The FCC's rules prohibit carriers from disclosing CPNI except under certain, limited circumstances, not applicable here. Whether the requested information does, or does not, fall under the definition of CPNI, this problem can be readily resolved by the issuance of an order requiring BellSouth to release the information, subject to the proprietary order previously issued in this docket.

Based on discussions with BellSouth's counsel and BellSouth's response to similar motions in other jurisdictions (see, the attached Order issued by the North Carolina Commission), AT&T believes that BellSouth will not oppose this request.

AT&T therefore asks that the Hearing Officer issue an order directing BellSouth to produce the requested information no later than February 11, 2004.

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2004, a copy of the foregoing document was serviced on the parties of record, via US mail:

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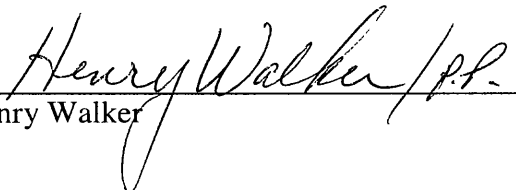
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DOCKET NO. P-100, SUB 133Q

In the Matter of
Triennial Review Order -- UNE-P) ORDER GRANTING AT&T'S
) MOTION TO REQUIRE BELL SOUTH
) TO RESPOND TO DISCOVERY

The Presiding Commissioner further believes good cause exists that BellSouth and the other parties to this proceeding may file with this Commission and, may provide to all other parties of record that have entered into the appropriate protective agreements, information that may consist of or that may contain CPNI in order to facilitate the timely exchange of information.

Any party objecting to this Order, in whole or in part, shall file any and all such objections with the Commission and shall serve all such objections on all parties of record no later than 5:00 p.m., January 28, 2004. If there are no objections filed accordingly, BellSouth shall provide the requested information on January 29 as ordered by this Commission.

IT IS, THEREFORE, SO ORDERED.

ISSUED BY ORDER OF THE COMMISSION.

This the 23rd day of January, 2004.

NORTH CAROLINA UTILITIES COMMISSION

Gail L. Mount

Gail L. Mount, Deputy Clerk